

February 28, 2025

VIA ECF

Honorable Lee G. Dunst
United States District Court, E.D.N.Y.
100 Federal Plaza, Courtroom 830
Central Islip, New York 11722

Re: *Myers v. County of Nassau*, No. 22-cv-07203-SJB-LGD (E.D.N.Y.)

Dear Magistrate Judge Dunst:

Pursuant to the Court's November 17, 2024 and January 15, 2025 Orders (ECF Nos. 75, 81), Plaintiff Jhisaiah Myers and Defendant County of Nassau, by their counsel, respectfully submit this Joint Status Report to the Court.

As stated in the Joint Status Report submitted January 31, 2025 [ECF No. 82] ("January Report"), Defendant gave notice to Plaintiff of its intent to serve a subpoena for records relevant to Plaintiff's deposition, including, among other things, his application to the New York City Police Department. Plaintiff produced various documents in response to the subpoena and undertook efforts to secure additional documents responsive to the subpoena. On February 10, 2025, Defendant informed Plaintiff of its intent to proceed with the subpoena to secure the balance of the requested documents.

Defendant produced to Plaintiff unredacted versions of GRRs, supplements to the GRRs, and related emails discussing applicants for the 2018 cycle and background investigation files (including applicant names) for those applicants disqualified during the 2018 cycle based on disrespect for the process of law for any underlying reason. ECF No. 82. Upon review of these productions, Plaintiff identified missing materials, which Defendant produced this week.

The Parties have completed depositions pursuant to Rule 30(b)(6) as to thirteen of the twenty-two topics noticed by Plaintiff on December 24, 2024. A deponent as to an additional topic is scheduled for March 5, 2025, and the Parties are coordinating the scheduling of a deponent for an additional topic later in March. Consistent with the Court's Order dated January 15, 2025 (ECF No. 81), Plaintiff will evaluate the need for testimony as to the remaining topics in view of the upcoming depositions. Plaintiff noticed the depositions of six additional fact witnesses on February 7, 2025. The Parties have agreed upon dates for three of these depositions and are conferring regarding dates for the remainder.

Respectfully submitted,

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